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July 11, 2001

RECEIVED

JUL 11 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman-Salas  
Secretary  
Federal Communications Commission  
The Portals, TW-A325  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: Notice of Oral Ex Parte Presentation  
ET Docket No. 00-221  
PR Docket No. 92-257

Dear Ms. Salas:

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, this notice is provided to confirm that Dr. Clifford H. Ray, Executive Vice President of Fairfield Industries, Inc. ("Fairfield"), Marc A. Lawrence, Senior Vice President of Fairfield, and counsel to Fairfield, met with a number of Commission officials yesterday, July 10, regarding the above-referenced proceedings. Meetings were held with Peter Tenhula and Allan Parr of Chairman Michael K. Powell's office; with Adam Krinsky of Commissioner Gloria Tristani's office; with Lauren Van Wazer of Commissioner Michael J. Copps' office; with Bryan Tramont of Commissioner Kathleen Q. Abernathy's office; with Bruce A. Franca, Acting Chief, Office of Engineering and Technology ("OET"), Julius Knapp, Chief, Policy and Rules Division of OET, Thomas Derenge, Chief, Spectrum Policy Branch of OET, Geraldine A. Matise, Deputy Chief, Policy and Rules Division of OET, Ira Keltz and Lisa Gaisford of OET, and Nese Guendelsberger of the Wireless Telecommunications Bureau; and with John Schaubel, Chief, and Scot Stone, Deputy Chief, of the Policy and Rules Branch, Public Safety and Private Wireless Division, Wireless Telecommunications Bureau ("WTB), and Brian Marenco and Tim Maguire of WTB.

During the meetings Fairfield's representatives discussed the issues raised in Fairfield's Comments and Reply Comments filed in ET Docket 00-221 and the points discussed in the materials contained in Attachment 1 hereto. Fairfield's representatives also provided the Commission officials with a copy of the materials contained in Attachment 2 hereto.

In addition to the foregoing, Fairfield's representatives urged that there is no need for a notice requirement for low power operations in 216-220 MHz given the unique, self-policing

# ARTER & HADDEN<sub>LLP</sub>

Ms. Magalie Roman-Salas  
July 11, 2001  
Page 2

nature and remoteness of geophysical operations. In this regard, Fairfield stressed the importance of protecting continued low power operations without additional, unnecessary regulatory burdens.

An original and three copies of this letter are submitted for inclusion in the above-referenced proceedings.

Sincerely,



William K. Keane

Mark Van Bergh

Counsel to Fairfield Industries, Inc.

Enclosures

cc (w/o encl.): Lauren Maxim Van Wazer

Peter Tenhula  
Adam Krinsky  
Bryan Tramont  
Bruce A. Franca  
Julius Knapp  
Thomas Derenge  
Geraldine A. Matise  
Ira Keltz  
Lisa Gaisford  
Nese Guendelsberger  
John Schaubel  
Scot Stone  
Brian Marengo  
Tim Maguire  
Allan Parr

## ATTACHMENT 1



**Fairfield Industries**

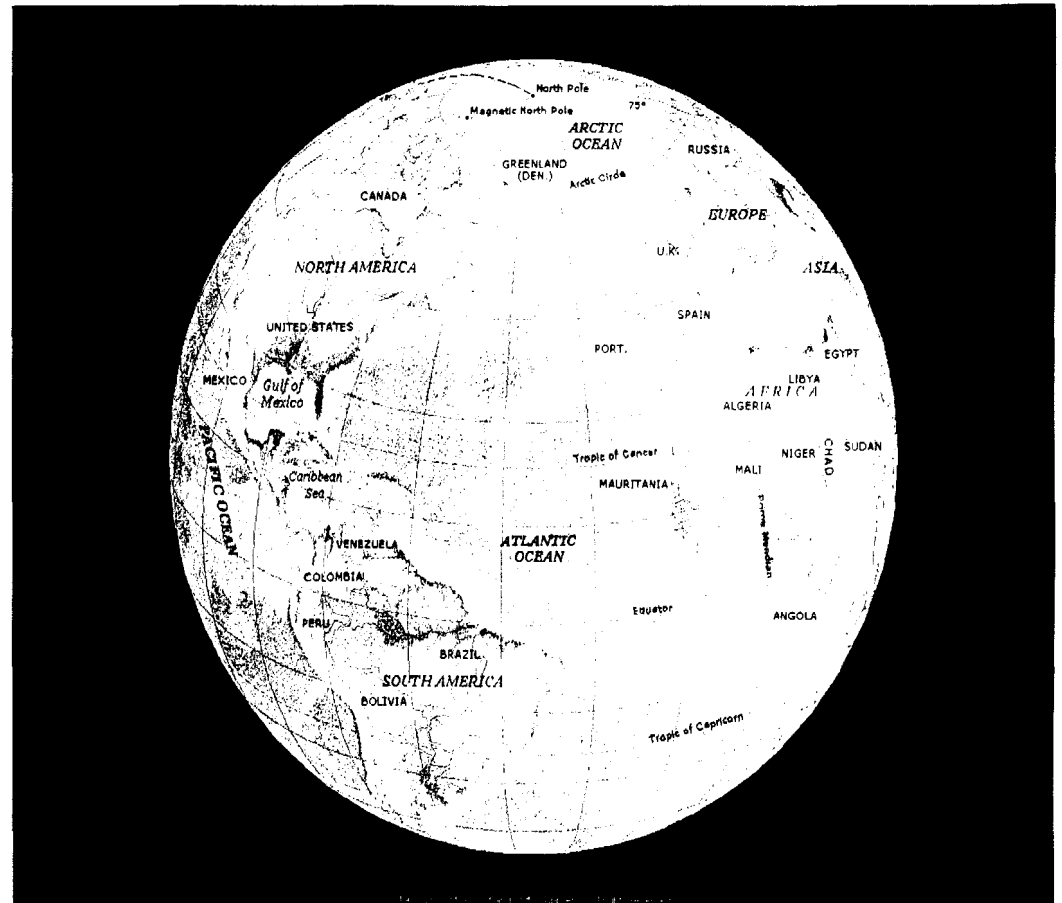
# **Fairfield Industries**

**Seismic Acquisition with Radio**

- **A privately-held, American owned company whose primary business is in oil and gas exploration**
- **Designs and manufactures seismic data acquisition equipment using radio telemetry**
- **Operates seismic crews using radio telemetry data acquisition equipment**
- **Processes and markets seismic data to oil and gas exploration companies**
- **In business 27 years and employs 350 people worldwide with headquarters in Houston, Texas**

# Fairfield Worldwide

- **Office Locations**
  - **USA (New York, Houston, Denver, New Orleans, Lafayette)**
  - **China (Beijing)**
  - **UK (London)**
  - **Russia (Moscow)**
  - **Vietnam (Ho Chi Minh City)**



# **The Radio Telemetry Advantage**

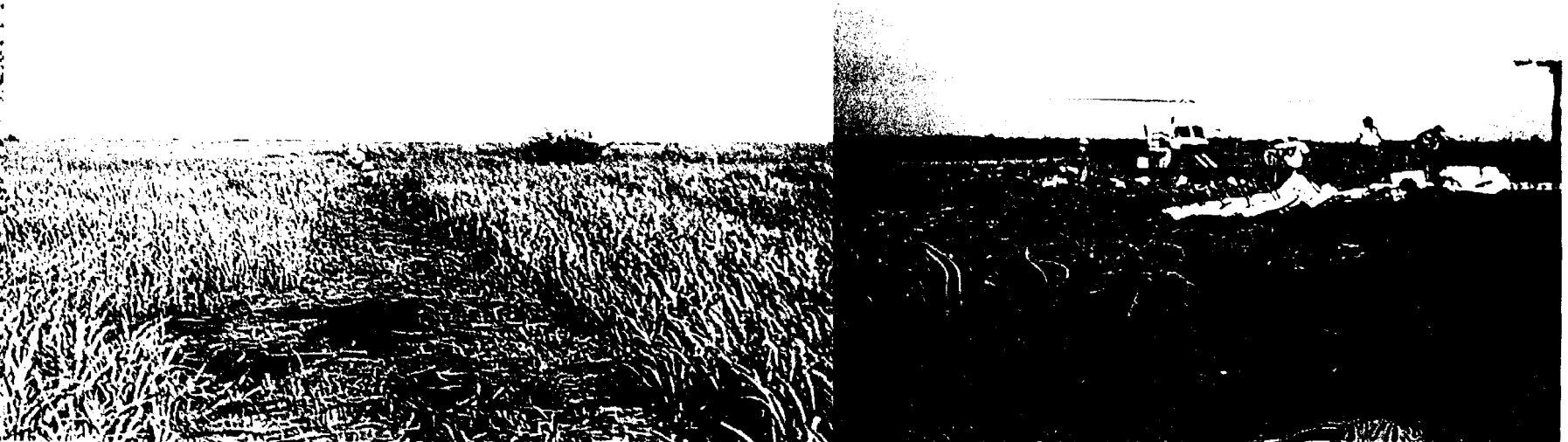
**Radio Telemetry eliminates the need for:**

- **Telemetry Interconnection Cables**
- **Line Crossing Units and Cables**

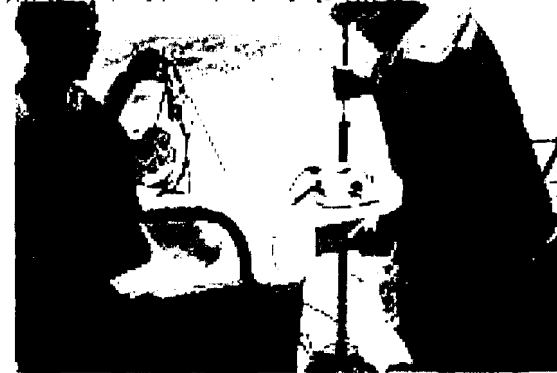
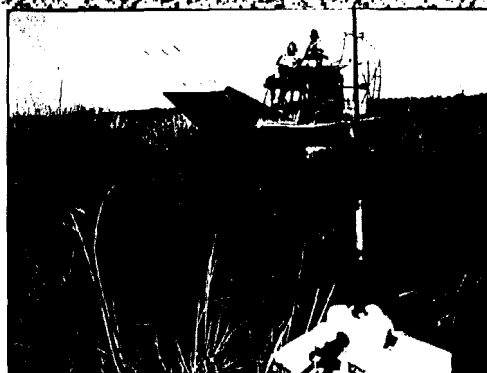
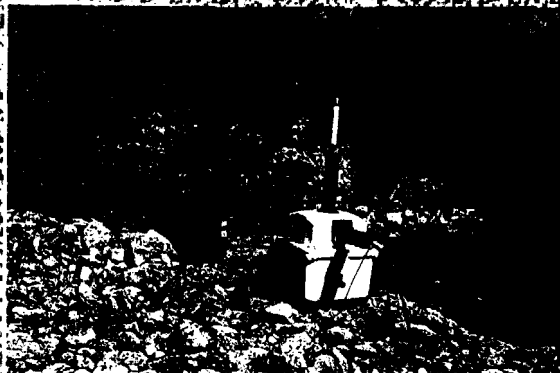
**Less Equipment in the Field means:**

- **Less environmental impact**
- **Lighter, more easily deployed**

**Seismic Acquisition with Radio**



# Radio System Flexibility



**Every Remote Unit is:**

- **Easily configured for Dry Land, Marsh/Swamp or Bay/Ocean Deployment**
- **Independently deployed allowing easy avoidance of obstacles such as roads and no trespassing zones**

# **The Environment**

## **Lower the Impact**

- **Less equipment**
- **Less Troubleshooting**
- **Design the survey around the area**





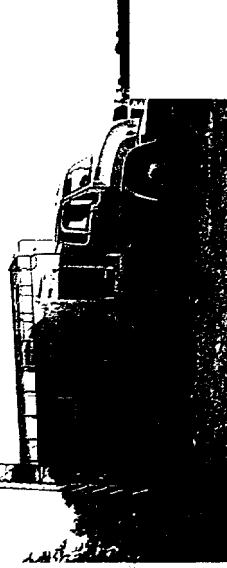
# Seismic Acquisition with Radio



## Land



*Vibroseis*

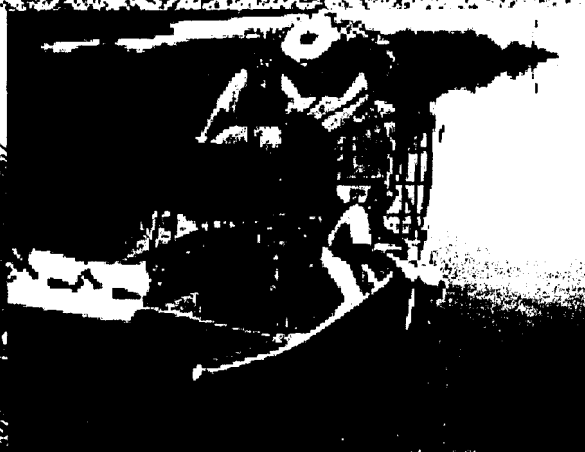


*Easily Deployed*



# Marsh-Swamp/Transition Zone

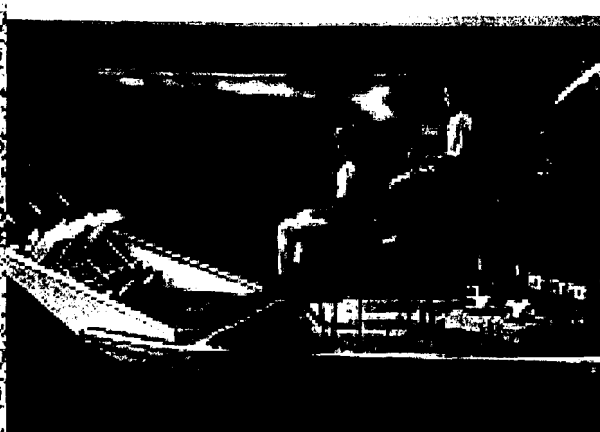
Seismic Acquisition with Radio



*Lightweight*

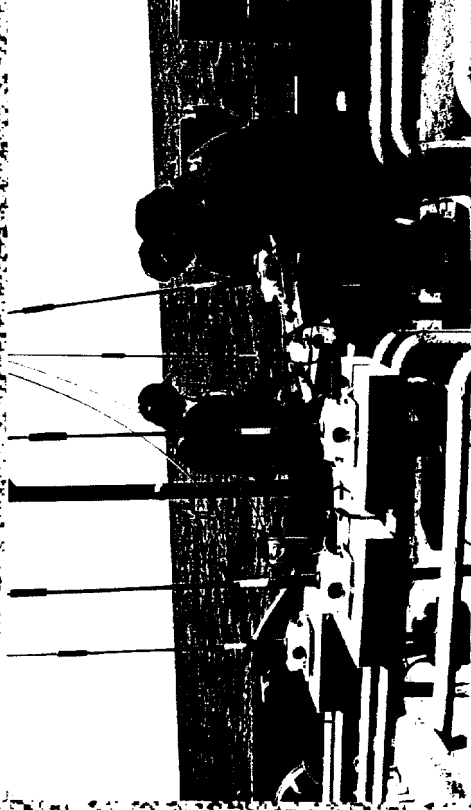
*Environment -  
Friendly*

*Man Portable*



# Shallow Marine

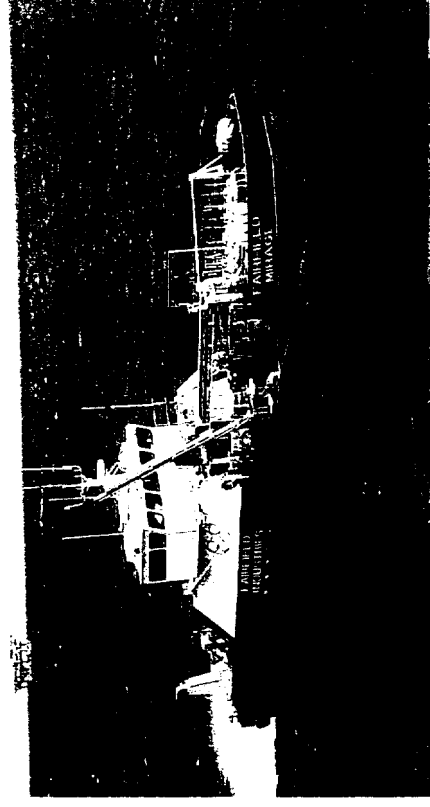
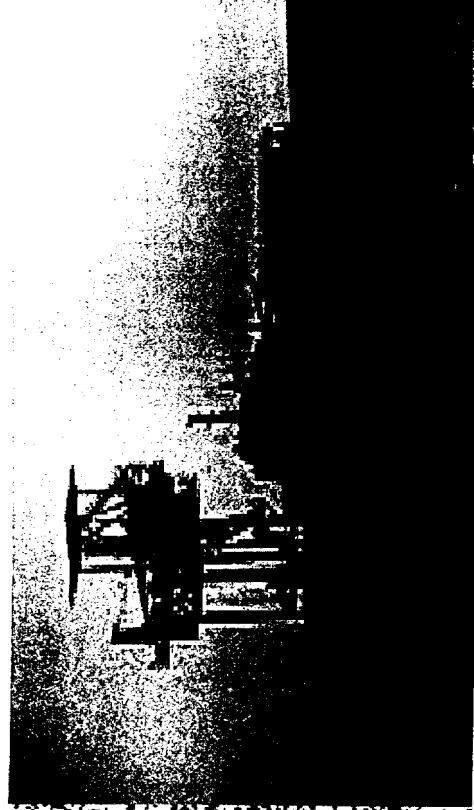
**Seismic Acquisition with Radio**



*Surfside to 100 Meters*



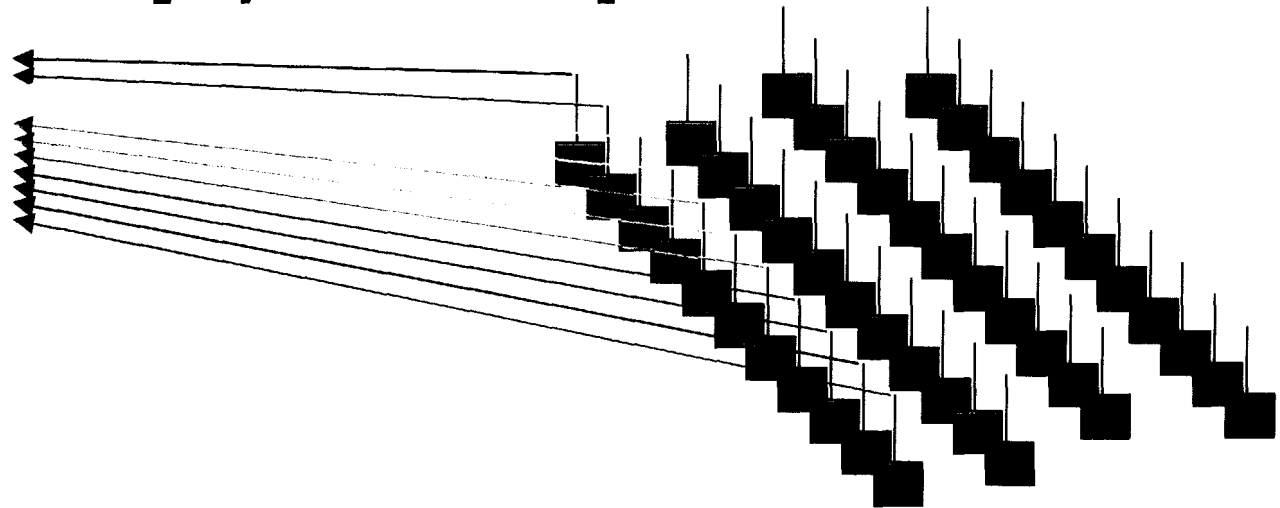
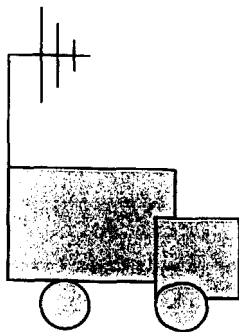
*Fewer Boats than OBC*



# Conceptual System Deployment

Remote acquisition units are normally placed in a rectangular grid of 3 to 5 miles in extent

- One frequency is used to command all units to acquire data for each excitation of the seismic source
- For each shot all remote units transmit sensor data back on a different narrow band frequency of 20 KHz simultaneously
- Units may be redeployed and multiple shots taken



# Why Is Seismic Telemetry So Important?

- Over the next 20 years, U.S. oil consumption will increase by 33 percent, natural gas consumption by well over 50 percent, and demand for electricity will rise by 45 percent.
- According to the Administration's National Energy Policy Development ("NEPD") Group chaired by Vice-President Cheney, "[t]o meet increased natural gas demand in the coming decades, total wells drilled annually will need to double the 1999 level by 2020."
- The President has issued an Executive Order (No. 13211, May 18, 2001) which requires Executive Branch agencies to consider the effects of their decisions on energy supply, and prepare Statements of Energy Effects if adverse impact is anticipated.



# **Fairfield's Concerns**

- Auctions to high power users could destroy the utility of the band for low power operations including, in particular, geophysical telemetry:
  - Geophysical operations are extremely sensitive to interference but cause none by virtue of operational necessity, geographic remoteness, and itinerant nature
  - Transaction costs associated with securing access to spectrum from auction winners could make seismic telemetry techniques prohibitively expensive

# **Fairfield's Solutions**

**Seismic Acquisition with Radio**

- Elevate low power users like geophysical telemetry to primary status
- Avoid auctions in 216-217 MHz where the Notice suggests the Commission has certain discretion
- Limit any further 216-220 MHz auctions to those scheduled for AMTS in the 217-218 and 219-220 MHz bands
- Require AMTS auction winners to meet current standards for operation of land stations as are found in Rule 80.123 (e.g., mobiles to operate at reduced power and height, and not beyond radio range of the coast station with which they are associated)

# Fairfield's Solutions

**Seismic Acquisition with Radio**

- Seismic operators should not be required to get permission from auction winners due to self-policing nature of seismic telemetry.
- Base/mobile configuration contemplated in the NPRM at para. 14 (base stations to operate at 216-218, mobiles at 218-220 MHz) should be applied to geographic area licensees only




\*

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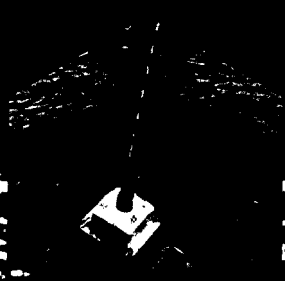
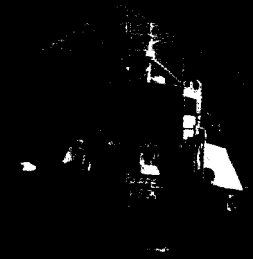
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ATTACHMENT 2



Multi-component  
brings new technology  
and greater flexibility  
to Fairfield's shallow-  
water expertise.





## Fairfield's Data Acquisition

Division is the seismic acquisition arm of Fairfield Industries, a full-service geophysical company.

As a leader in shallow-water seismic data acquisition, the Acquisition Division has a strong commitment to safety and the environment. Fairfield has worked for the last 20 years in the shallow waters of the Gulf of Mexico and around the world. Fairfield crews are now extending acquisition

structured to be as flexible as possible allowing the ever developing techniques and technology of multi-component data acquisition to be quickly incorporated in the crews daily working pattern.

As part of Fairfield's commitment to quality, this approach means the seismic data collected provides the geoscientist the information to build a much more reliable image of the reservoir in question. This, in turn, makes management of the

achieved in a safe working environment.

Onboard awareness and training programs are run on a continual basis.

Whether it is on land, transition zone or shallow water, Fairfield crews bring expertise and devotion to safety into the field. This strong dedicated approach has helped Fairfield build a 3-D seismic database that now covers over 1500 OCS blocks

# 4C 3L



capabilities to water depths of 90 meters, using the latest radio-telemetry acquisition techniques and multi-component technology to provide high quality data, even in traditionally difficult seismic areas.

Fairfield has been

reservoir significantly more predictable and therefore dramatically more profitable.

At Fairfield, the company and its employees work together for safety and quality. Fairfield's policy teaches crews that profitability can only be

and measures over 30,000 square kilometers. Fairfield has also acquired over 585 square miles or over 1500 square kilometers of 4-Component seismic data.

Techniques that eliminate cables and allow tighter turns enable Fairfield to

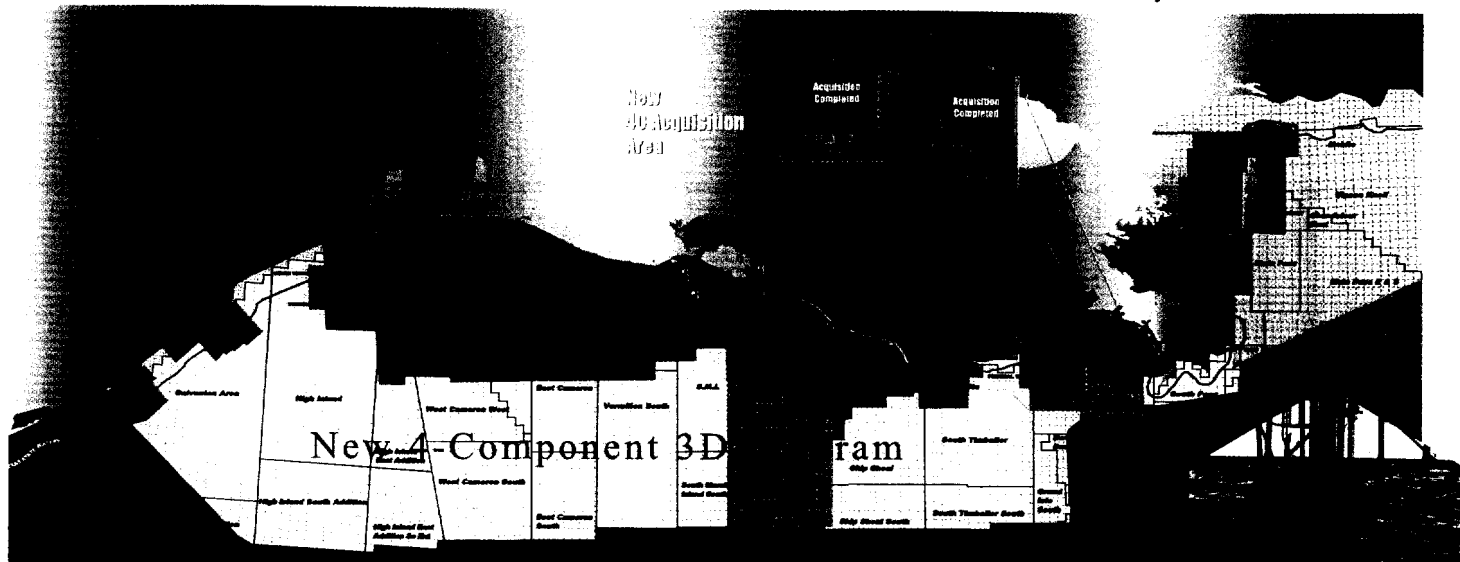


work in much shallower water than traditionally possible. These same techniques bring with them the bonus of less down time and far greater efficiency than previously attainable.

associated with OBC operations around the many rigs.

Using our Box Data Acquisition System, built in Houston by Fairfield

source, along with real-time asset management of equipment. This has enabled Fairfield to reduce the size of its seismic crews while increasing their efficiency. The Network



Purpose built boats means Fairfield operates one of the most technologically advanced fleets in the Gulf. This allows Fairfield crews to work efficiently, and with the greatest respect to the environment, even around the many hazards and obstacles typically encountered in shallow-water / transition zone locations. The lack of

cables and the

maneuverability of our shallow-water vessels means little or no skips normally

Industries, Fairfield crews utilize onboard graphical workstations to provide acquisition management, pre-planning layout and acquisition quality control, as well as run RU test attributes and trace attributes.

The latest navigation techniques mean real-time positioning of all elements with RDGPS. A data distribution network is run from the recorder on the mother vessel. Fleet safety is monitored at all times from the central navigation

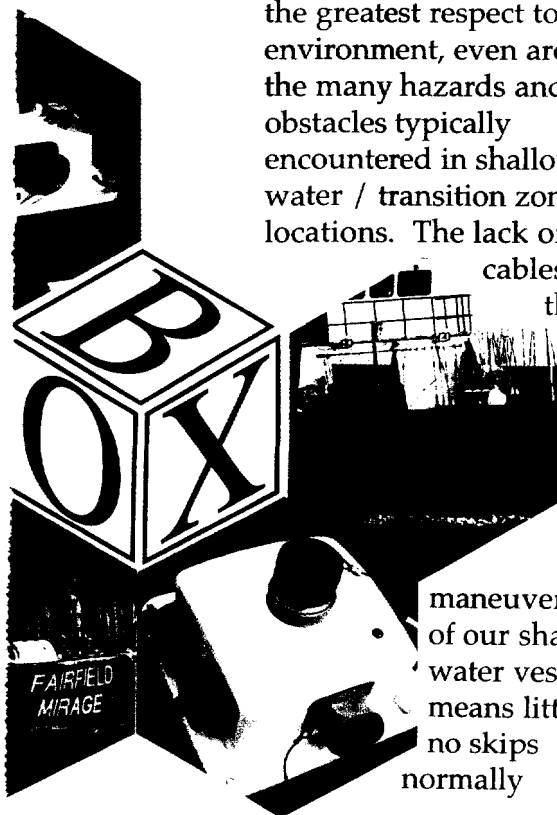
also performs real-time binning receiver location, quality control and data management.

In a regular month at sea, Fairfield crews on average can acquire between 8 and 10 OCS blocks, a total of 62 to 120 square miles per month. That is 5.5 to 10.5 square kilometers of data every day. All production estimates are parameter dependent.

Fairfield is currently acquiring 4-Component data, allowing the oil and gas industry to access the latest technology in seismic data acquisition.



Fairfield Houston Texas





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